

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.Natalie Yael ISLAS
YOB: 2005
COC: United States*Defendant(s)*

Case No. 7:24-mj-00364

United States Courts
Southern District of Texas

FILED

March 09, 2024

CRIMINAL COMPLAINT

Nathan Ochsner, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 8, 2024 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC 1001

Falsifies, conceals, or covers up by any trick, scheme, or device a material fact; Knowingly makes any materially false, fictitious, or fraudulent statement or representation; Makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by AUSA Theodore V. Parran III

/s/ Juan R. Cienega*Complainant's signature*

Juan R. Cienega, U.S. Customs and Border Protection

Printed name and title☐ Sworn to telephonically and signed electronically
per Fed.R.Cr.4.1Date: March 9, 2024 @ 2:24 p.m.City and state: McAllen, Texas*Judge's signature*

Hon. Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On or about Friday, March 8th, 2024, in Starr County, Texas, within the Southern District of Texas, Natalie Yael ISLAS (The defendant) did knowingly and willfully: falsify and conceal and cover up by a trick, scheme, and device, material facts; and made materially false, fictitious, and fraudulent statements or representations in a matter within the jurisdiction of the executive branch of the United States, namely, the United States Department of Homeland Security, Customs and Border Protection, by intentionally and willfully representing that minor J.O.S. was a United States Citizen, when in truth and in fact, minor J.O.S. is an undocumented alien without status to enter or remain in the United States.

On or about Friday, March 8th, 2024, at approximately 10:22 pm, Natalie Yael ISLAS (The defendant), a United States citizen, attempted to bring into the United States through the Rio Grande City, Texas, Port of Entry (POE), undocumented alien minor J.O.S.

Upon reaching primary inspection at the POE, ISLAS attempted to enter with J.O.S. At pedestrian primary, ISLAS presented a State of Texas birth certificate for her minor U.S. citizen sibling (initials D.Y.I.), and represented to CBP Officers that J.O.S. was her minor U.S. citizen sibling D.Y.I. as indicated in the Texas Birth Certificate.

CBP Officers noticed that the minor appeared nervous, and referred ISLAS and the minor to secondary inspection for further checks. In secondary inspection, ISLAS informed CBP Officers that she did not know who the minor was, and that it was not her sibling D.Y.I.

ISLAS was then placed in custody and provided her Miranda warnings, and she agreed to speak with officers. ISLAS admitted to knowing the minor J.O.S. did not have any legal documentation to enter the United States and that she was using her minor sibling's birth certificate to facilitate J.O.S.'s illegal entry into the United States. If successful, and once in the United States, she was to continue walking and a vehicle was going to pick both of them up. She stated she was going to be compensated \$800 dollars.

CBP conducted record checks that showed J.O.S. has no legal status to enter or remain in the United States.